



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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TF/NEM  
F.# 2015R00173

*271 Cadman Plaza East  
Brooklyn, New York 11201*

August 21, 2015

**By Email and ECF**

Andrew M. Lankler, Esq.  
Baker Botts LLP  
30 Rockefeller Plaza  
New York, NY 10112-4498

Re:    United States v. Gregg Mulholland, et al.  
Criminal Docket No. 14-476 (S-1) (ILG)

Dear Mr. Lankler:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides discovery in the above-captioned matter. The materials in this production are contained on one compact disc and are Bates-numbered EDNY-TT-PRIV-000000000890 through EDNY-TT-PRIV-000000000896. Please also consider this letter to be the government's request for reciprocal discovery.

This letter discloses documents provided to the government by a cooperating witness ("CW-1"), and supplements the government's earlier disclosure under cover of letter dated August 10, 2015 and August 20, 2015 of documents from the same witness.

The government here provides to you with additional firewall materials which the government has determined can be disclosed to your client; these are communications between officers of Legacy Global Markets S.A. and an attorney. Should you have any questions about any of the firewall materials, please contact the undersigned.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney

By: /s/  
Tali Farhadian  
Nadia E. Moore  
Assistant U.S. Attorneys  
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cc: Clerk of the Court (ILG) (by ECF)  
Eugene E. Ingoglia, Esq. (Counsel for Robert Bandfield) (by ECF)